



## STEVEN J. MOSER, P.C.

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VIA ECF

Hon. Steven I. Locke  
United States District Court  
Eastern District of New York  
100 Federal Plaza  
Central Islip, NY 11722

**Re:** *Siancas v. Rallye Motors, et al.*, 14-cv-6151 (JS) (SIL)  
Response to Motion to be Excused from Settlement Conference

Dear Judge Locke:

I represent the Plaintiffs in the above referenced FLSA matter.

On September 25, 2015, Plaintiffs moved to Amend the Complaint. ECF No. 99. The proposed First Amended Complaint includes claims against Lisa Agolia and Michael Agolia. Mr. Chong represents Exclusive Detailing, Lisa Agolia, and Michael Agolia.

Exclusive has not as yet filed for bankruptcy, and there has been no representation that Lisa Agolia and Michael Agolia will be filing for bankruptcy. Therefore, there is no basis for the request to be excused from the settlement conference.

Plaintiffs request that the settlement conference proceed with the attendance of Exclusive Detailing, Inc., Michael Agolia, Lisa Agolia, and the Rallye Defendants.

I have spoken with Counsel for the Rallye Defendants. The Rallye Defendants likewise oppose any request of Exclusive Detailing, Inc. to be excused from attendance at the conference.

Respectfully submitted,



Steven John Moser